

August 29, 2002

Post-it™ Fax Note	7671	Date	8/29/02	# of pages	21
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August 29, 2002

To: Renee DeShazo

From: Elizabeth Erickson

Subj: Response to Comments for 2000 303(d)listing for Nitrate/Nitrite and Organic Enrichment/DO for Reach 6 (EPA Reach 8) of the Santa Clara River

The County Sanitation Districts of Los Angeles(CSDLA) submitted a comment letter dated June 14, 2002 which included new data and requested that Reach 6 (EPA Reach 8) be delisted. I have completed additional analysis of the new data, the previous data, and the components of the best professional judgement of the recommendation to retain the listing for nitrate/nitrite and I summarize these results in detail below. A summary of comments for the nutrient listing questions on this reach is also provided.

Summary

The new data set was collected over only two years of the sample period. Some submitted data was incorrectly attributed to this reach, while it was collected in the adjacent downstream reach, which has more dilution.

The downstream reach has a lower objective (5 mg/L) than the reach for which delisting is requested. Of eleven samples taken in the downstream reach immediately over the reach boundary (station RC), 4 or 36% of the nitrate-nitrite as nitrogen exceeded the 5 mg/L objective, demonstrating that the nutrient levels in the upstream reach are high enough to prevent attainment of the objective at every location in the downstream reach.

A nutrient TMDL is currently underway in this reach proposed for delisting and ongoing sampling efforts and visual observations show the presence of algae and nitrate-nitrite and nitrogen exceedances in this reach.

Although the discharger claims that the ammonia specific objective in the Basin Plan will require compliance with the ammonia objective by 2003, this requirement will not address nitrate, DO or organic enrichment objectives. Further, the discharger has not submitted any data or reports confirming progress to attain the ammonia objective at their plant.

Based on the insufficient data set and the uncertainty in achieving the ammonia objectives, Regional Board staff recommends retaining the listings for nitrate-nitrite, organic enrichment/DO in the reach.

Location and Objectives

Reach 6 (EPA Reach 8) lies between the Bouquest Canyon Bridge and the west pier of the Highway 99 bridge (see figure) . It receives flow from CSDLA's Saugus Water Reclamation Plant, Santa Clara River (dry), South Fork of the Santa Clara River(dry), Bouquet Creek and

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15 exceeded the criteria of 1 m/gL, for 75% exceedance. Because this analysis postdates the submission of listing recommendations for 303(d) a new listing has not been recommended, but our permitting group has been asked to prepare a Notice of Violation.

Reach 6 (EPA Reach 8) should be listed for algae. Algae problems have been documented in both Reach 5 and 6. Figures are attached which demonstrate that in October 2001 for Reach 5 and in June 2002 for Reach 6, the algae problem probably exceed the RWQCB-LA Basin Plan Criteria (pg3-8) which states that "waters shall not contain biostimulatory substances in concentrations that promote aquatic growth to the extent that such growth causes nuisance or adversely affects beneficial uses." Some of these algae problems, including chlorophyll-A mass measurements were documented in October 2001 and should be publically available this year. Access problems, as described below, have prevented further documentation of these observations and the lack of confirmation is the reason Reach 6 (EPA Reach 8) was not recommended for algae listing in the 2000 303(d) listing cycle.

Reach 6 (EPA Reach 8) might also be listed for coliform. RWQCB samples for coliform were collected on May 4, 1999, but were not evaluated for this 303(d), partially due to the difficulties with duplicating the sample due to access problems. On that date, 9000 MPN total coliform was recorded at Bouquet Canyon bridge and 700 was recorded at Highway 99. Additional sampling of these high levels is expected to demonstrate a coliform impairment.

Public Verification of Data Used for Listing

The RWQCB-LA has not been able to access the site sufficiently to verify the water quality information used in this request for delisting. As two examples of these continuous problems, a RWQCB funded study by UCLA, which was designed to document nutrient impairments, requested access of the land owner, Newhall Land and Farming, on Aug 13, 2001 for an October study after the Newhall had signed an MOU agreeing to participate in monitoring. The samplers were ultimately asked to leave the property before completing their assessment of Reach 6 (EPA Reach 8) when they accompanied CSDLA during their sampling of the receiving water stations (see emails attached). Citizen monitoring groups were also denied access to this property in June 2002. When the attached photos were finally taken on City of Santa Clarita property in that month, Newhall responded by saying that access to the sampling point would not be allowed. This problem has been experienced by other agencies, and resulted in an incomplete assessment of the water quality problems in the area. For example, approval of Newhall's development plans by the Los Angeles County Supervisors was delayed this summer after a Fish and Game search warrant revealed that they had illegally graded endangered spine flowers.

Attachments:

Figure: location map

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Picture 1: algae at Receiving Water Station RD below Valencia WRP Outfall, October 2001.

Picture 2: Algae looking upstream from historic Railroad Bridge site between MCBean Parkway and San Fransisquito Creek on Santa Clara River, June 30, 2002-08-29

Picture 3: Algae beneath historic Railroad Bridge site between MCBean Parkway and San Fransisquito Creek on Santa Clara River, June 30, 2002-08-29

Table New data submitted

Table LACSD data from RC

Table NPDES report data

Table Regional Board Data not submitted for 303(d) listing

Emails from Mark Subbotin (Newhall Land) Aug 14, September 10, 18, and 19, 2001.

Emails for Heather Merenda, City of Santa Clarita, July 30, 2002.

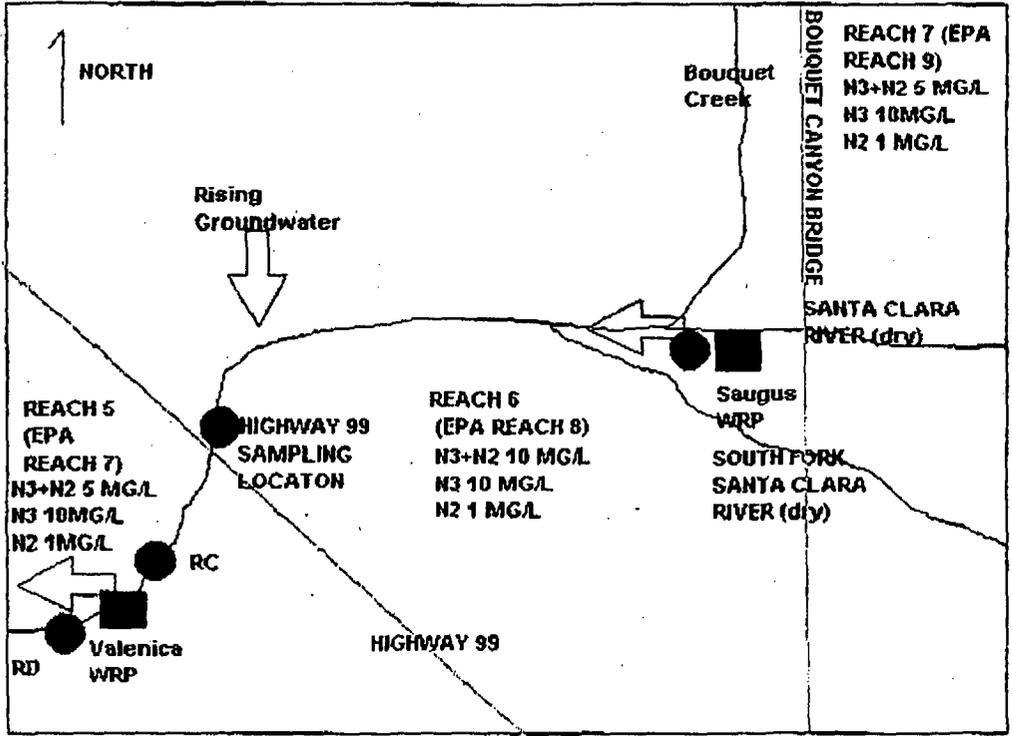
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Santa Clara River: Location Map for Reach 6 (EPA Reach 8)



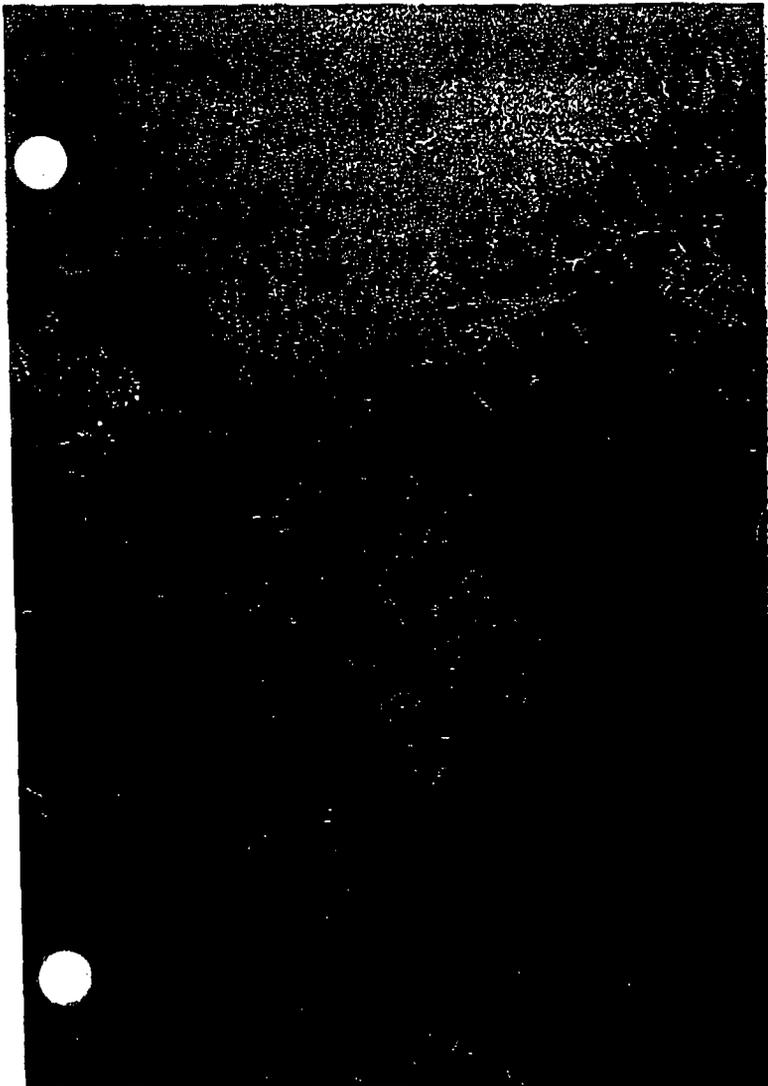
Not to scale, locations are approximate

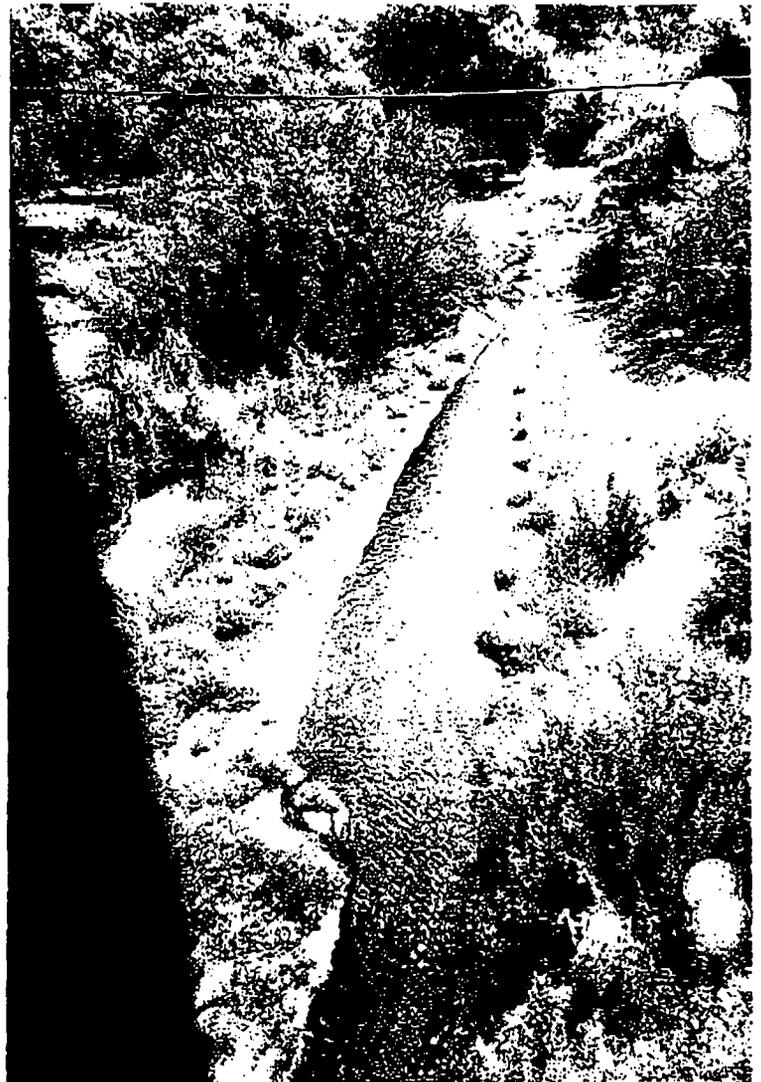
■ EFFLUENT DISCHARGE

● MONITORING POINT

↓ SOURCE OF FLOW

--- HIGHWAYS AND REACH BOUNDARIES





New Data Submitted CSDLA													
Parameter	Test Material/Qualifier	Result	Units	MDL	Sample Met	Sample Date	Sample Time	Station Name	Latitude	Longitude	Waterbody	Stream Reach	Hydrologic
NITRATE+nitrite (AS NITROGEN)		1.19	MGL			2/23/99	11:30	SCR-Rb			SANTA CLAR	SC-6	403.51
NITRATE+nitrite (AS NITROGEN)		1.15	MGL			5/25/99	11:30	SCR-Rb			SANTA CLAR	SC-6	403.51
NITRATE+nitrite (AS NITROGEN)		1.89	MGL			8/3/99	11:35	SCR-Rb			SANTA CLAR	SC-6	403.51
NITRATE+nitrite (AS NITROGEN)		4.35	MGL			11/11/99	11:30	SCR-Rb			SANTA CLAR	SC-6	403.51
NITRATE+nitrite (AS NITROGEN)		2.33	MGL			2/3/00	10:50	SCR-Rb			SANTA CLAR	SC-6	403.51
NITRATE+nitrite (AS NITROGEN)		4.26	MGL			8/17/00	10:45	SCR-Rb			SANTA CLAR	SC-6	403.51
NITRATE+nitrite (AS NITROGEN)		3.54	MGL			8/23/00	10:35	SCR-Rb			SANTA CLAR	SC-6	403.51
NITRATE+nitrite (AS NITROGEN)		2.55	MGL			11/21/00	10:45	SCR-Rb			SANTA CLAR	SC-6	403.51
NITRATE+nitrite (AS NITROGEN)		3.44	MGL			2/16/01	11:50	SCR-Rb			SANTA CLAR	SC-6	403.51
NITRATE+nitrite (AS NITROGEN)		3.4	MGL			5/21/01		SCR-Rb					
NITRATE+nitrite (AS NITROGEN)		3.18	MGL			8/21/01		SCR-Rb					
NITRATE+nitrite (AS NITROGEN)		1.5	MGL			10/31/01		SCR-Rb					
NITRATE+nitrite (AS NITROGEN)		2.17	MGL			11/7/01		SCR-Rb					
NITRATE+nitrite (AS NITROGEN)		0.16	MGL			11/15/01		SCR-Rb			below outfall		
NITRATE+nitrite (AS NITROGEN)		5.15	MGL			6/29/00		old road bridge			count	14	
NITRATE+nitrite (AS NITROGEN)		5	MGL			7/27/00		old road bridge			exceed	0	
NITRATE+nitrite (AS NITROGEN)		4.58	MGL			8/28/00		old road bridge			impair	0	
NITRATE+nitrite (AS NITROGEN)		5.68	MGL			9/29/00		old road bridge			Hwy 99		
NITRATE+nitrite (AS NITROGEN)		6.06	MGL			11/2/00		old road bridge			count	19	
NITRATE+nitrite (AS NITROGEN)		4.96	MGL			11/27/00		old road bridge			exceed	5	
NITRATE+nitrite (AS NITROGEN)		6.24	MGL			12/21/00		old road bridge			impair	0.263158	
NITRATE+nitrite (AS NITROGEN)		2.79	MGL			1/23/01		old road bridge					
NITRATE+nitrite (AS NITROGEN)		2.24	MGL			2/20/01		old road bridge					
NITRATE+nitrite (AS NITROGEN)		2.67	MGL			3/15/01		old road bridge					
NITRATE+nitrite (AS NITROGEN)		4.52	MGL			5/2/01		old road bridge					
NITRATE+nitrite (AS NITROGEN)		3.12	MGL			5/29/01		old road bridge					
NITRATE+nitrite (AS NITROGEN)		6.61	MGL			7/24/01		old road bridge					
NITRATE+nitrite (AS NITROGEN)		4.29	MGL			8/1/01		old road bridge					
NITRATE+nitrite (AS NITROGEN)		2.63	MGL			8/27/01		old road bridge					
NITRATE+nitrite (AS NITROGEN)		1.78	MGL			9/25/01		old road bridge					
NITRATE+nitrite (AS NITROGEN)		1.73	MGL			10/5/01		old road bridge					
NITRATE+nitrite (AS NITROGEN)		1.87	MGL			11/7/01		old road bridge					
NITRATE+nitrite (AS NITROGEN)		2.36	MGL			12/12/01		old road bridge					
		dates of sampling				2/23/99-12/12/01							
		number				33							
		min				0.16							
		mean				3.308182							
		max				6.61							
		median				3.12							
		standard deviation				1.635941							
		No. of samples above 10 mg/L (objective)				0							
		% of samples above 10 mg/L				0							
		No. of samples above 5 mg/L (downstream)				5							
		% of samples above 5 mg/L				0.151515							

CSDLA data sent as part of NPDES reports but not submitted for 303(d)

Parameter Date Value

Receiving water station RB

Nitrate	Feb-97	4.960
Nitrate	May-97	1.490
Nitrate	Aug-97	2.990
Nitrate	Nov-97	2.960
Nitrate	Feb-99	0.200
Nitrate	Feb-99	0.410
Nitrate	May-99	0.240
Nitrate	May-99	0.300
Nitrate	Aug-99	0.470
Nitrate	Aug-99	2.880
Nitrate	Nov-99	0.810
Nitrate	Nov-99	1.240
Nitrate	Feb-00	<0.05
Nitrate	May-00	1.870
Nitrate	Aug-00	1.410
Nitrate	Nov-00	0.790
Nitrate	Feb-01	1.610
Nitrate	May-01	1.370
Nitrate	Aug-01	1.060
Nitrate	Nov-01	0.510

Groundwater station T4N-16W-16R1

nitrate	2/20/97	5.43
nitrite	2/20/97	<.01
nitrate	8/7/97	7.85
nitrite	8/7/97	NA
nitrate	Feb-01	5.21
nitrite	Feb-01	<.01
nitrate	Aug-01	5.86
nitrite	Aug-01	<.01

nitrate

number	19
exceed	0
impair%	none

nitrite

number	20
exceed	15
impair%	0.75

Nitrite	Feb-97	1.580
Nitrite	May-97	1.020
Nitrite	Aug-97	1.110
Nitrite	Nov-97	0.963
Nitrite	Feb-99	0.988
Nitrite	Feb-99	0.712
Nitrite	May-99	0.912
Nitrite	May-99	0.690
Nitrite	Aug-99	1.220
Nitrite	Aug-99	2.980
Nitrite	Nov-99	3.540
Nitrite	Nov-99	3.090
Nitrite	Feb-00	2.280
Nitrite	May-00	2.390
Nitrite	Aug-00	2.130
Nitrite	Nov-00	1.760
Nitrite	Feb-01	1.830
Nitrite	May-01	2.030
Nitrite	Aug-01	2.120
Nitrite	Nov-01	1.660

LACSD data from receiving water station RC as submitted for 87-00					N3+n2=								
NITRATE (AS LIQUID)		2.15	MGL	G	8/19/97	11:30	SCR-RC	2.16	SANTA CLAI SC-6	403.51	SANTA CLAI	SANTA CLAI LOS ANGE	Valencia WWRP, NPDES
NITRITE (AS LIQUID)		0.01	MGL	G	8/19/97	11:30	SCR-RC		SANTA CLAI SC-6	403.51	SANTA CLAI	SANTA CLAI LOS ANGE	Valencia WWRP, NPDES
NITRATE (AS LIQUID)		3.54	MGL	G	11/5/97	11:30	SCR-RC	3.55	SANTA CLAI SC-6	403.51	SANTA CLAI	SANTA CLAI LOS ANGE	Valencia WWRP, NPDES
NITRITE (AS LIQUID)		0.01	MGL	G	11/5/97	11:30	SCR-RC		SANTA CLAI SC-6	403.51	SANTA CLAI	SANTA CLAI LOS ANGE	Valencia WWRP, NPDES
NITRATE (AS LIQUID)		3.03	MGL	G	2/11/98	11:35	SCR-RC	3.08	SANTA CLAI SC-6	403.51	SANTA CLAI	SANTA CLAI LOS ANGE	Valencia WWRP, NPDES
NITRITE (AS LIQUID)		0.05	MGL	G	2/11/98	11:35	SCR-RC		SANTA CLAI SC-6	403.51	SANTA CLAI	SANTA CLAI LOS ANGE	Valencia WWRP, NPDES
NITRATE (AS LIQUID)		2.32	MGL	G	5/21/98	11:30	SCR-RC	2.43	SANTA CLAI SC-6	403.51	SANTA CLAI	SANTA CLAI LOS ANGE	Valencia WWRP, NPDES
NITRITE (AS LIQUID)		0.11	MGL	G	5/21/98	11:30	SCR-RC		SANTA CLAI SC-6	403.51	SANTA CLAI	SANTA CLAI LOS ANGE	Valencia WWRP, NPDES
NITRATE (AS LIQUID)		3.54	MGL	G	8/19/98	10:50	SCR-RC	3.57	SANTA CLAI SC-6	403.51	SANTA CLAI	SANTA CLAI LOS ANGE	Valencia WWRP, NPDES
NITRITE (AS LIQUID)		0.03	MGL	G	8/19/98	10:50	SCR-RC		SANTA CLAI SC-6	403.51	SANTA CLAI	SANTA CLAI LOS ANGE	Valencia WWRP, NPDES
NITRATE (AS LIQUID)		5.02	MGL	G	11/5/98	10:45	SCR-RC	5.09	SANTA CLAI SC-6	403.51	SANTA CLAI	SANTA CLAI LOS ANGE	Valencia WWRP, NPDES
NITRITE (AS LIQUID)		0.07	MGL	G	11/5/98	10:45	SCR-RC		SANTA CLAI SC-6	403.51	SANTA CLAI	SANTA CLAI LOS ANGE	Valencia WWRP, NPDES
NITRATE (AS LIQUID)		3.77	MGL	G	2/23/99	10:35	SCR-RC	3.95	SANTA CLAI SC-6	403.51	SANTA CLAI	SANTA CLAI LOS ANGE	Valencia WWRP, NPDES
NITRITE (AS LIQUID)		0.18	MGL	G	2/23/99	10:35	SCR-RC		SANTA CLAI SC-6	403.51	SANTA CLAI	SANTA CLAI LOS ANGE	Valencia WWRP, NPDES
NITRATE (AS LIQUID)		4.39	MGL	G	5/26/99	10:45	SCR-RC	4.57	SANTA CLAI SC-6	403.51	SANTA CLAI	SANTA CLAI LOS ANGE	Valencia WWRP, NPDES
NITRITE (AS LIQUID)		0.18	MGL	G	5/26/99	10:45	SCR-RC		SANTA CLAI SC-6	403.51	SANTA CLAI	SANTA CLAI LOS ANGE	Valencia WWRP, NPDES
NITRATE (AS LIQUID)		6.74	MGL	G	8/3/99	11:59	SCR-RC	6.92	SANTA CLAI SC-6	403.51	SANTA CLAI	SANTA CLAI LOS ANGE	Valencia WWRP, NPDES
NITRITE (AS LIQUID)		0.18	MGL	G	8/3/99	11:50	SCR-RC		SANTA CLAI SC-6	403.51	SANTA CLAI	SANTA CLAI LOS ANGE	Valencia WWRP, NPDES
NITRATE (AS LIQUID)		5.68	MGL	G	11/11/99	11:30	SCR-RC	5.76	SANTA CLAI SC-6	403.51	SANTA CLAI	SANTA CLAI LOS ANGE	Valencia WWRP, NPDES
NITRITE (AS LIQUID)		0.08	MGL	G	11/11/99	11:30	SCR-RC		SANTA CLAI SC-6	403.51	SANTA CLAI	SANTA CLAI LOS ANGE	Valencia WWRP, NPDES
NITRATE (AS LIQUID)		5.69	MGL	G	2/3/00	10:55	SCR-RC	6.14	SANTA CLAI SC-6	403.51	SANTA CLAI	SANTA CLAI LOS ANGE	Valencia WWRP, NPDES
NITRITE (AS LIQUID)		0.45	MGL	G	2/3/00	10:55	SCR-RC		SANTA CLAI SC-6	403.51	SANTA CLAI	SANTA CLAI LOS ANGE	Valencia WWRP, NPDES
							count	count					
							total #	11					
							>10	>5					
							# exceed	0					
							% exceed	0	0.353636				

